

ORIGINAL

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By: Kevin P. Weimer, Clerk
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

CARLOS RUBEN RAMIREZ ROMERO,
KELYN ROXANA ORTIZ FLORES,
A/K/A CARLA PATRICIA MEDINA, AND
OSCAR VALDEZ SAMANIELO,

Criminal Indictment

No. **1 : 21 - C R 394**

THE GRAND JURY CHARGES THAT:

Count One

Beginning on a date unknown to the Grand Jury, but at least by in or about July 2021, and continuing until at least September 8, 2021, in the Northern District of Georgia, and elsewhere, the defendants,

CARLOS RUBEN RAMIREZ ROMERO, AND
OSCAR VALDEZ SAMANIELO,

did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with each other, and with others known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 841(a)(1), that is, to knowingly and intentionally possess with intent to distribute a controlled substance, said conspiracy involving:

- (a) at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(A), and cocaine, a

Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(C), as to the defendant,

CARLOS RUBEN RAMIREZ ROMERO,

(b) at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(B), as to the defendant,

OSCAR VALDEZ SAMANIELO,

all in violation of Title 21, United States Code, Section 846.

Count Two

On or about August 11, 2021, in the Northern District of Georgia, the defendant, CARLOS RUBEN RAMIREZ ROMERO, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a controlled substance, said act involving at least 500 grams of methamphetamine, a Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(A), all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Count Three

On or about September 8, 2021, in the Northern District of Georgia, the defendant, CARLOS RUBEN RAMIREZ ROMERO, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a controlled substance, said act involving at least 500 grams of methamphetamine, a Schedule II controlled substance pursuant to Title 21,

United States Code, Section 841(b)(1)(A), all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Count Four

On or about September 8, 2021, in the Northern District of Georgia, the defendants,

CARLOS RUBEN RAMIREZ ROMERO, AND
OSCAR VALDEZ SAMANIELO,

aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance, said act involving at least 50 grams of methamphetamine, a Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(B), all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Count Five

On or about September 8, 2021, in the Northern District of Georgia, the defendants, CARLOS RUBEN RAMIREZ ROMERO, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a controlled substance, said act involving at least 500 grams of methamphetamine, a Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(A), and cocaine, a Schedule II controlled substance pursuant to Title 21, United States Code, Section 841(b)(1)(C), all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Count Six

On or about September 8, 2021, in the Northern District of Georgia, the defendant, CARLOS RUBEN RAMIREZ ROMERO, did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a Court of the United States, that is, the possession with intent to distribute a controlled substance described in Count Five of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

Count Seven

On or about September 8, 2021, in the Northern District of Georgia, the defendant, CARLOS RUBEN RAMIREZ ROMERO, knowing that he had been previously convicted of Possession of Cocaine with Intent to Distribute in the Superior Court of Gwinnett County, Georgia, on or about August 12, 2019, which was a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Kel-Tec KSG, XP963, 12 gauge shotgun, in violation of Title 18, United States Code, Section 922(g)(1).

Count Eight

On or about September 8, 2021, in the Northern District of Georgia, the defendant, KELYN ROXANA ORTIZ FLORES, did forcibly assault, resist, oppose, impede, intimidate, and interfere with H.M., while H.M. was employed as a Special Agent with the Drug Enforcement Administration, and while said agent was engaged in the performance of his official duties, all in violation of Title 18, United States Code, Section 111(a)(1).

Count Nine
(Money Laundering Conspiracy)
(21 U.S.C. § 1956(h))

Beginning on a date unknown to the grand jury, but at least by in or about July 2021, and continuing to a date unknown to the grand jury but at least to on or about September 8, 2021, in the Northern District of Georgia, and elsewhere, the defendants,

CARLOS RUBEN RAMIREZ ROMERO, AND,
KELYN ROXANA ORTIZ FLORES,
a/k/a Carla Patricia Medina

together with each other, and with others known and unknown to the grand jury, did knowingly combine, conspire, confederate, agree and have a tacit understanding to commit violations of the law of the United States of America under Title 18, United States Code, Sections 1956, that is, to knowingly conduct and attempt to conduct a financial transaction in and affecting interstate commerce, which involved the proceeds of specified unlawful activity, that is, the felonious distribution of a controlled substance, punishable under a law of the United States, and while conducting and attempting to conduct such financial transaction, knowing the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing the transaction was designed in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of proceeds of said unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h) and Section 2.

Forfeiture

Upon conviction of one or more of the offenses alleged in Counts One through Five of this Indictment, the defendants, CARLOS RUBEN RAMIREZ ROMERO, and OSCAR VALDEZ SAMANIELO, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including but not limited to, the following:

- (a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense for which the defendant is convicted.

Upon conviction of one or more the offenses alleged in Counts Six and Seven of this Indictment, the defendant, CARLOS RUBEN RAMIREZ ROMERO, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the offense.

Upon conviction of the offense alleged in Count Nine of this Indictment, the defendants, CARLOS RUBEN RAMIREZ ROMERO, and KELYN ROXANA ORTIZ FLORES, a/k/a Carla Patricia Medina, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the offense, and any property traceable to such property, including but not limited to the following:

(a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted.

If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28 United States Code, Section 2461(c), to seek

forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A True BILL
Dellrow T. Brunson
FOREPERSON

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